

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

----- X
TEYO JOHNSON, :
: :
Plaintiff, : :
: :
-against- : Case No. 1:22-cv-06669(PAE)(GWG)
: :
EVERYREALM INC., :
JULIA SCHWARTZ in her individual and :
professional capacities, WILLIAM KERR in his :
individual and professional capacities, and :
JANINE YORIO in her individual and :
professional capacities. : DEFENDANTS EVERYREALM
: INC., JULIA SCHWARTZ,
: WILLIAM KERR, AND JANINE
: YORIO'S NOTICE OF MOTION
: TO DISMISS
: :
Defendants. :
----- X

PLEASE TAKE NOTICE THAT Defendants Everyrealm Inc. (f/k/a Republic Realm Inc.), Julia Schwartz, William Kerr, and Janine Yorio (collectively “the Everyrealm Defendants”) shall, upon Plaintiff Teyo Johnson’s (“Plaintiff”) Second Amended Complaint; and the Everyrealm Defendants’ Memorandum of Law; all filed herewith, move this Court, at Thurgood Marshall United States Courthouse, 40 Foley Square, New York, New York 10007, on such date and time as the Court may direct, for an Order pursuant to Rule 12(b)(6) of the Federal Rules of Civil Procedure dismissing Plaintiff’s Second Amended Complaint as to the following claims: Section 1981 Race and Color Discrimination; disparate pay under the New York Equal Pay Law; Race and Color Discrimination under the NYSHRL and NYCHRL; Title VII Race, Gender and Color Discrimination, Sexual Harassment, and Retaliation; Aiding and Abetting under the NYSHRL and NYCHRL; Intentional Infliction of Emotional Distress (“IIED”); and all claims seeking to impose individual liability against Ms. Schwartz and Mr. Kerr, and as to the Seventh Cause of Action, Mrs. Yorio too.

Dated: New York, New York
March 10, 2023

PROSKAUER ROSE LLP

By: /s/ Lloyd B. Chinn

Lloyd B. Chinn, Esq.
Eleven Times Square
New York, New York 10036-8299
Ph. (212) 969-3000
Fax (212) 969-2900
lchinn@proskauer.com
*Attorney for Everyrealm Inc. (f/k/a Republic
Realm Inc.), Julia Schwartz, William Kerr,
and Janine Yorio*